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June 19, 2020

Honorable Jesse M. Furman  
United States District Court Judge  
U.S. District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**United States v. Adrienne Roberts: 18-cr-528**

Dear Judge Furman:

I am CJA Counsel to defendant Adrienne Roberts in the above-referenced case. I am in receipt of the Court's order denying Ms. Roberts's renewed motion for compassionate release. I write to address one aspect of Ms. Roberts's plight, which was not addressed in the Court's order.

According to Ms. Roberts, she has been designated to the United States Penitentiary in Hazelton, West Virginia. Such a placement would put her some 350 miles from New York City, hours away from even the closest airport. Ms. Roberts maintains a very real fear that such a designation will prevent her from seeing her family, especially her children, for the duration of her term of imprisonment.

Additionally, Ms. Roberts informs counsel that she has a rival at Hazelton. An inmate with which Ms. Roberts has had violent interactions with at the MCC that has been sentenced to 40 years imprisonment for murder and has little to lose. Ms. Roberts fears for her safety if put in the same lockup as her rival.

The Court was cognizant of this issue at sentencing and recommended at Ms. Roberts's judgment that she be designated to a facility as close as possible to New York to facilitate family visits. (Despite Ms. Roberts's gruff brush off that, "[I]t don't make a difference". See Dkt. 288-1 pg. 29)

In order to maintain Ms. Roberts's family ties, particularly those with her children, we respectfully renew that request and ask that the Court endorse this letter and urge the BOP to reconsider designating Ms. Roberts to a facility where she will have access to her family.

As always, the Court's consideration is greatly appreciated.

Sincerely,

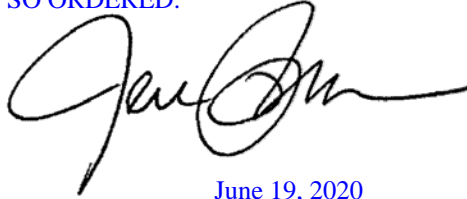
/s/ Jacob B. Mitchell  
Jacob B. Mitchell, Esq.

Cc: All Attorneys (ECF)

Application GRANTED. As counsel is aware, the Court has no authority to specify a designation, which is within the control of the Bureau of Prisons. That said, the Court urges the Bureau of Prisons to designate Ms. Roberts to a facility as close to the New York City area as possible to facilitate the maintenance of ties to her family. Among other things, limitations on travel in light of the COVID-19 pandemic may make it particularly difficult for family to visit if Ms. Roberts is located far away from the New York City area.

The Clerk of Court is directed to terminate ECF No. 315.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jacob B. Mitchell', is written over the typed name.

June 19, 2020